

**Commonwealth of Kentucky**  
**Division for Air Quality**

**PERMIT APPLICATION SUMMARY FORM**

Completed by: Martha M. Allman

**General Information**

Name: United States Smokeless Tobacco Manufacturing, LLC  
Address: 1600 Main Street, Hopkinsville, Kentucky 42240  
Date application received: August 25, 2006 and September 20, 2006  
SIC/Source description: 2131  
AFS(10-digit) Plant ID: 21-047-00055  
Application log number: APE 20060002  
Permit number: F-06-045

**APPLICATION TYPE/PERMIT ACTIVITY:**

- |  |  |
|--|--|
| <input type="checkbox"/> Initial issuance          | <input type="checkbox"/> General permit                    |
| <input type="checkbox"/> Permit modification       | <input checked="" type="checkbox"/> Conditional major      |
| __Administrative                                   | <input type="checkbox"/> Title V                           |
| __Minor  | <input type="checkbox"/> Synthetic minor                   |
| __Significant                                      | <input type="checkbox"/> Operating                         |
| <input checked="" type="checkbox"/> Permit renewal | <input checked="" type="checkbox"/> Construction/operating |

**COMPLIANCE SUMMARY:**

- |   |   |
|---|---|
| <input type="checkbox"/> Source is out of compliance                | <input type="checkbox"/> Compliance schedule included |
| <input checked="" type="checkbox"/> Compliance certification signed |   |

**APPLICABLE REQUIREMENTS LIST:**

- |  |                                  |   |
|--|----------------------------------|---|
| <input type="checkbox"/> NSR   | <input type="checkbox"/> NSPS    | <input checked="" type="checkbox"/> SIP |
| <input type="checkbox"/> PSD   | <input type="checkbox"/> NESHAPS | <input type="checkbox"/> Other          |
| <input type="checkbox"/> Netted out of PSD/NSR <input type="checkbox"/> Not major modification per 401 KAR 51:001, 1(116)(b) |                                  |   |

**MISCELLANEOUS:**

- ☐ Acid rain source
- ☐ Source subject to 112(r)
- ☒ Source applied for federally enforceable emissions cap
- ☐ Source provided terms for alternative operating scenarios
- ☐ Source subject to a MACT standard
- ☐ Source requested case-by-case 112(g) or (j) determination
- ☐ Application proposes new control technology
- ☒ Certified by responsible official
- ☐ Diagrams or drawings included
- ☐ Confidential business information (CBI) submitted in application
- ☐ Pollution Prevention Measures
- ☐ Area is non-attainment (list pollutants):

Summary form:

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**Emissions Summary**

Pollutant	Actual (tpy)	Potential (tpy)
PM	11.3	67.71
SO <sub>2</sub>	.02	.036
NO <sub>x</sub>	3.61	66.85
CO	4.5	36.30
VOC	8.18	68.85
Phosphine	0.39	0.8
HAP	<10.0	<10.0

**DESCRIPTION:**

United States Smokeless Tobacco Manufacturing Company (USSTMC) has applied for renewal of its conditional major permit. USSTMC manufactures chewing and smoking tobacco in Christian County, Kentucky. The permit includes a new process activity, Cure Preparation Mixers, that prepares tobacco for curing by mixing it with water salts, flavors, and ethanol in 4 new rotary mixers. The permittee has opted for a federally enforceable conditional major permit limiting the emission below 100 tons for each regulated air pollutant.

**EMISSIONS AND OPERATING CAP DESCRIPTION:**

USSTMC has the potential to be a major source for PM, NO<sub>x</sub> and VOC emissions. However, the company has requested to be classified as a conditional major source with a federally enforceable limit not to equal or exceed 100 tons per year (12-consecutive months). Accordingly, USSTMC shall limit leaf and drying operations (source units 101, 102, 103, 201 and 202) to 4650 hours per year and total Volatile Organic Compounds (VOC) shall not equal or exceed 90 tons during any consecutive twelve month period for the entire source. The indirect heat exchangers will run for 8760 hours per year, while the emergency generators shall be limited to 500 hours per year. Pesticide fogging shall not exceed 1440 gallons/year and 576 hours/year (12-month rolling). The operation and the application of phosphine fumigant shall not exceed 3000 pounds/year and 288 hours/year.